

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
SOUTHERN 1:16-cv-26

LAUREN CRIGLER,

Plaintiff,

vs.

CHEMONICS INTERNATIONAL, INC.
and ALLIED WORLD NATIONAL
ASSURANCE COMPANY/BROADSPIRE,

Defendants.

COMPLAINT

1. Lauren Crigler is a citizen of Durham County, North Carolina.
2. Chemonics International, Inc. is a corporation with a principal place of business in Washington, D.C. and has a registered agent for service of process of CT Corporation System. The registered agent has an address of 1015 15th Street NW, Suite 1000, Washington, District of Columbia 20005.
3. Allied World National Assurance Company is an insurer of unknown corporate structure who has not registered with the North Carolina Secretary of State. They may be served by service upon the North Carolina Commissioner of Insurance as their statutory agent.
4. Ms. Crigler has a Defense Base Act case against the defendants. OWCP No. 06-302873 and 06-302874.
5. On November 21st, 2015 the Judge granted Summary Judgment on her motion and awarded medical benefits and all necessary treatment as a result of her injury. (Exhibit 1).

6. Defendants have failed to pay bills relating to this treatment.
7. Plaintiff's counsel has tried to get carrier to pay for these benefits without having to file this Order with the court.
8. All administrative requirements have been exhausted. (See Exhibit 2). The Office of Administrative Law Judges do not have enforcement powers, accordingly, this action is necessary and filed pursuant to 33 U.S.C. 921(5)(d).

9. 1st Claim for Relief-Equitable

10. Ms. Crigler was awarded benefits. She seeks to have this court enter an Order enforcing the Order of Judge Paul C. Johnson, Jr. and Order the defendants to set up and provide the medical treatment and other relief granted.

2nd Claim for Relief- Monetary Relief

11. Ms. Crigler asks that this court Order the defendants to pay all past due bills for pain management, mileage and other medical treatment granted in the Order.

WHEREFORE, the Plaintiff asks for an Order granting:

- 1) The relief awarded by Judge Paul C. Johnson Jr.;
- 2) The cost of treatment, past bills and mileage;
- 3) Attorneys fees, costs and such other relief as this court deems proper.

Respectfully submitted this the 13th day of January, 2016.

CROSSLEY McINTOSH COLLIER HANLEY & EDES, PLLC

/s/ Norwood Blanchard

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